

**Before the  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2020-\_\_\_\_-C**

IN RE:

Application of TriCoLink, Inc.,	)
For Designation as an Eligible	)
Telecommunications Carrier	)
Pursuant to Section 214(e)(2) of the	)
Communications Act of 1934	)

**APPLICATION OF TRICOLINK, INC.,  
FOR DESIGNATION AS  
AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

Pursuant to Section 214(e)(2) of the Communications Act of 1934 (the “Act”)<sup>1</sup> and Section 103-690 of the South Carolina Code of Regulations,<sup>2</sup> TriCoLink, Inc. (“TriCoLink”, the “Applicant”, or the “Company”), hereby files this Application with the South Carolina Public Service Commission (“Commission”) for designation as an Eligible Telecommunications Carrier (“ETC”) in the State of South Carolina.

This designation is sought in all areas where TriCoLink, through its participation in the Rural Electric Cooperative Consortium, has been allocated Rural Digital Opportunity Fund (“RDOF”) Phase I support by the Federal Communications Commission (“FCC”) as a winner in the RDOF Phase I auction (“Auction 904”),<sup>3</sup> as well as in additional service areas.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> S.C. Code R.103-690.

<sup>3</sup> *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021*, AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90, FCC Public Notice, DA 20-1422 (Dec. 7, 2020). The Rural Electric Cooperative Consortium submitted a

## I. INTRODUCTION.

TriCoLink meets all of the statutory and regulatory requirements and prerequisites for ETC designation. Designation of TriCoLink as an ETC in the State of South Carolina will serve the public interest by enabling Applicant to provide subsidized broadband and voice services to consumers and businesses in rural areas that the Company proposes to serve.

In accordance with the Commission's Order 2001-419,<sup>4</sup> TriCoLink will contribute to the South Carolina Universal Service Fund based on revenues that it earns from its South Carolina customers if it is designated as an ETC.

If designated as an ETC, TriCoLink will use high-cost support to assist with the deployment of its voice and broadband network to serve consumers throughout its proposed service areas; to offer and maintain high-quality voice and broadband services to customers; to ensure the reliability of its network providing advanced broadband services to the public. Additionally, high-cost support will enable TriCoLink to provide Lifeline discounted service to qualifying low-income customers who reside within the Company's service areas and who may otherwise not afford service.

TriCoLink is obligated by the FCC to obtain ETC designation status by June 7, 2021, which is 180 days after the announcement by the FCC on December 7, 2020, that the Company is a winning bidder in the RDOF Phase I auction in the census blocks in which the Company was

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short-form application in the RDOF Phase I auction that included Tri-County Electric Cooperative, Inc., the parent of TriCoLink.

<sup>4</sup> *Proceeding to Establish Guidelines for an Intrastate Universal Service Fund*, Docket No. 97-239-C, Order on Universal Service Fund, Order No. 2001-419 (June 6, 2001), accessed at <https://dms.psc.sc.gov/Attachments/Order/1FD07089-EF67-A30E-7075D29870C6B95D>.

awarded RDOF Phase I support.<sup>5</sup> As a result, TriCoLink requests expeditious action by the Commission so that the Company may meet this FCC requirement.

Please address all correspondence, communications, pleadings, notices, orders, and decisions relating to this Application to:

John G. Felder, Sr.  
The Felder Firm, LLP  
P.O. Box 346  
St. Matthews, SC 29135  
Phone: (803) 874-1430  
Fax: (803) 655-7167  
E-mail: [johngfelder@sc.rr.com](mailto:johngfelder@sc.rr.com)

With a copy to:

Todd B. Lantor  
Lukas, LaFuria, Gutierrez & Sachs, LLP  
8300 Greensboro Drive  
Suite 1200  
Tysons, VA 22012  
Phone: (703) 584-8671  
Fax: (703) 584-8696  
E-mail: [tlantor@fcclaw.com](mailto:tlantor@fcclaw.com)

## II. BACKGROUND.

TriCoLink is a newly-formed, wholly-owned subsidiary of Tri-County Electric Cooperative, Inc. (the “Cooperative”), a non-profit rural electric cooperative that is owned by its members, and is organized and existing under the laws of the State of South Carolina. The Cooperative provides electric service to customers in Calhoun, Orangeburg, Richland, Lexington, Kershaw, and

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<sup>5</sup> *Rural Digital Opportunity Fund, et al.*, WC Docket No. 19-126, *et al.*, Report and Order, 35 FCC Rcd 686, 727 (¶ 92) (2020) (“*RDOF Order*”) (establishing the 180-day deadline).

Sumter counties. The Cooperative currently has over 18,000 meters and over 2,700 miles of distribution lines.<sup>6</sup>

TriCoLink, a domestic corporation incorporated in the State of South Carolina, effective June 15, 2020, was formed to assist with the deployment and operation of a new state-of-the-art, low-latency, fiber-to-the-home (“FTTH”) network, and to provide high-speed broadband Internet access and Voice over Internet Protocol (“VoIP”) services to customers its service area, many of whom currently lack any access to such services. TriCoLink will provide FTTH access to all 15,000 members in the Cooperative’s service area. “The broadband network will deliver symmetrical gigabit Internet capabilities—among the fastest and most robust in the nation—along with high-quality VoIP phone services.”<sup>7</sup>

TriCoLink will deploy broadband and interconnected VoIP services throughout the RDOF Phase I-eligible census blocks identified in **Exhibit A1** and seeks High-Cost and Low-Income (Lifeline) ETC designation from the Commission to serve these census blocks. In addition, Applicant seeks Lifeline-only ETC designation status in additional service areas primarily consisting of Tri-County Electric Cooperative, Inc.’s electric service footprint, identified in **Exhibit A2**. A map of TriCoLink’s proposed ETC Designation Area is displayed in **Exhibit B**.

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<sup>6</sup> See Tri-County Electric Cooperative Website, accessed at <https://tri-countyelectric.net/coverage-area>.

<sup>7</sup> *Id.*, accessed at <https://tri-countyelectric.net/sites/tce/files/TriCoLink%20will%20provide%20world.pdf>.



TriCoLink will offer low-latency broadband service at actual speeds of at least 1 Gigabit per second downstream and 500 Mbps upstream and will offer at least 2 Terabytes of monthly usage. In addition, Applicant will provide its customers with voice-grade access to the Public Switched Telephone Network (“PSTN”) through its provision of interconnected VoIP service.

### **III. THE COMMISSION HAS JURISDICTION AND AUTHORITY TO DESIGNATE ELIGIBLE TELECOMMUNICATIONS CARRIERS.**

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e)(2) shall be eligible to receive specific federal universal service support.”<sup>8</sup> Section 214(e)(2) of the Act states that state commissions “shall designate” common carriers that meet the statutory requirements as ETCs. The FCC has further ruled that Section 214(e)(2) of the Act “provides state commissions with the primary responsibility for designating ETCs.”<sup>9</sup>

Section 103-690.A.3 of the S.C. Code Regulations references “the commission’s authority and jurisdiction to impose such regulations on ETCs ... as are in the public interest[,]”<sup>10</sup> and Section 103-690.C establishes the requirements that an applicant must meet in order to be designated an ETC.<sup>11</sup> Therefore, the Commission has the authority and the primary responsibility under federal law to designate TriCoLink as an ETC for federal universal service support purposes.

### **IV. TRICOLINK MEETS ALL FEDERAL AND STATE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER.**

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<sup>8</sup> 47 U.S.C. § 254(e).

<sup>9</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371, 6372 (¶ 1, n.2) (2005) (emphasis added) (interpreting 47 U.S.C. § 254(e)(2)). See S.C. Code R.103-690 (designation of eligible telecommunications carriers), R.103-690.1 (annual reporting requirements for designated eligible telecommunications carriers).

<sup>10</sup> S.C. Code R.103-690.A.(3). The Commission also indicates that its regulations establishing requirements for the designation of ETCs are for “the purpose of receiving federal universal service support, not state universal service support ....” *Id.*, R.103-690.A.1.

<sup>11</sup> *Id.*, R.103-690.C.

As demonstrated in the following sections, TriCoLink satisfies each of the statutory and regulatory requirements for designation as an ETC, as set forth in the Act, in the FCC's rules, and in the rules of the Commission.

**A. TriCoLink Will Provide Service as a Common Carrier.**

To be designated as an ETC, an applicant must be a common carrier.<sup>12</sup> For the customers and locations where RDOF Phase I support has been allocated, TriCoLink will provide its services on a common carrier basis. As certified by an officer of the Company, TriCoLink is a common carrier for purposes of Section 214(e) of the Act.<sup>13</sup>

**B. TriCoLink Will Offer the Services Supported by the Federal Universal Service Support Mechanisms.**

To be designated as an ETC, an applicant must offer throughout its proposed service areas the services set forth in Section 54.101(a) of the FCC's rules,<sup>14</sup> either by using its own facilities or a combination of its own facilities and the resale of another carrier's services.

Attached as **Exhibit C** is a sworn affidavit that TriCoLink commits to offer all of the services designated for support by the Federal Communications Commission.<sup>15</sup> As discussed in the following sections, the Company will offer, upon designation as an ETC, all of the supported services throughout the areas in which the Company is requesting designation as an ETC. The

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<sup>12</sup> 47 U.S.C. § 214(e)(1) (providing that a "common carrier" must be designated as an ETC to receive universal service support). The Act defines a "common carrier" as "any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy ...." 47 U.S.C. § 153(11).

<sup>13</sup> See **Exhibit C**.

<sup>14</sup> 47 CFR § 54.101(a).

<sup>15</sup> See *Designation of Fort Mojave Telecommunications, Inc. , et al. , as Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, AAD/USB File No. 98-28, Memorandum Opinion and Order, 13 FCC Rcd 4547, 4552 (¶ 11) (1998) ("*Fort Mojave*"). In *Fort Mojave*, the FCC indicated that it will designate carriers as ETCs, pursuant to Section 214(e)(6) of the Act, upon finding that they "offer or will be able to offer" the supported services throughout the service area.

Company commits to provide these services consistent with applicable FCC rules relating to high-cost universal service support.

### **1. Voice Grade Access to the Public Switched Telephone Network.**

Section 54.101(b) of the FCC's rules provides that an ETC must provide "voice telephony service" in order to receive federal universal support.<sup>16</sup> Section 54.101(a)(1) provides that:

Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.<sup>17</sup>

TriCoLink will meet this requirement through the provision of IP-based voice communications service that is interconnected to the PSTN. The Company will be legally responsible for dealing with customer problems, providing quality of service guarantees, and meeting universal service-related requirements.

TriCoLink will offer stand-alone voice telephony service throughout its proposed ETC Designation Area and will offer such service at rates that are reasonably comparable to urban rates. This service will include minutes of use for local service provided at no charge to end users and access to emergency service via E-911, wherever available from local government or public safety organizations. The Company also commits to provide toll limitation services to qualifying low-income consumers as provided in Sections 54.400-54.423 of the FCC's rules.<sup>18</sup>

### **2. Broadband Internet Access Services.**

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<sup>16</sup> 47 CFR § 54.101(b).

<sup>17</sup> *Id.*, § 54.101(a)(1).

<sup>18</sup> *Id.*, §§ 54.400-54.423.

TriCoLink's broadband Internet offering will provide the capability to transmit data to, and receive data from, all or substantially all Internet endpoints, including any capabilities that are incidental to, and enable the operation of, communications services.<sup>19</sup> The Company will (1) offer low-latency Internet service at actual speeds of at least 1 Gbps downstream and 500 Mbps upstream; (2) offer at least 2 terabytes of monthly usage to customers within its proposed ETC Designation Area; and (3) offer such service at rates that are reasonably comparable to urban rates.

### **3. Lifeline Service.**

As required by Section 54.405(a) of the FCC's rules,<sup>20</sup> TriCoLink will offer subsidized Lifeline voice and broadband services, including a standalone voice service offering, to qualifying low-income consumers in accordance with the FCC's rules within its proposed ETC Designation Area.<sup>21</sup>

#### **C. TriCoLink Will Comply with Applicable Service and Performance Quality Requirements Adopted by the FCC.**

As certified by an officer of the Company,<sup>22</sup> TriCoLink will comply with the service requirements applicable to the federal universal service support that it receives, including the requirements for receipt of RDOF Phase I support.

Specifically, TriCoLink, as a "long-form" applicant for RDOF Phase I support,<sup>23</sup> must:

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<sup>19</sup> See *id.*, § 54.101(a)(2) (stating that "[e]ligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service").

<sup>20</sup> 47 CFR § 54.405(a).

<sup>21</sup> *Id.*, §§ 54.400-54.423.

<sup>22</sup> See Exhibit C.

<sup>23</sup> Each Auction 904 winning bidder "is required to file an application for Rural Digital Opportunity Fund support, referred to as a long-form application ...." *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34, *et al.*, Public Notice, 35 FCC Rcd 6077, 6163 (¶ 286) (2020).

(1) certify in its long-form application filed with the FCC that it complies with all statutory and regulatory requirements for receiving the universal service support that it seeks as of the long-form application filing deadline;<sup>24</sup>

(2) certify to the FCC that it is financially and technically capable of meeting the relevant public interest obligations for each performance tier and latency combination in the geographic areas in which it seeks support;<sup>25</sup>

(3) certify to the FCC that it will meet the relevant public interest obligations for each performance tier and latency combination for which it was deemed a winning bidder, including the requirement that it will offer service at rates that are equal to or lower than the FCC's reasonable comparability benchmarks for fixed services offered in urban areas;<sup>26</sup>

(4) demonstrate to the FCC that it has a design plan with supportable technologies to meet the relevant RDOF public interest obligations in the areas covered by the winning bids, by submitting technical information to support the operational assertions made in the short-form application;<sup>27</sup> and

(5) certify to the FCC that it will have available funds for all project costs that exceed the amount of RDOF support to be received for the first two years of its support term, and also describe how the required construction will be funded.<sup>28</sup>

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<sup>24</sup> *Id.* at 6165 (¶ 296) (citing 47 CFR § 54.804(b)(2)(v)).

<sup>25</sup> *Id.* at 6166 (¶ 298) (citing 47 CFR § 54.804(b)(2)(ii)).

<sup>26</sup> *Id.* (¶ 299) (citing 47 CFR § 54.804(b)(2)(iii)).

<sup>27</sup> *Id.* at 6167 (¶ 301) (citing 47 CFR § 54.804(b)(2)(iv)). The FCC's requirements include a certification from a professional engineer that the long-form applicant's fiber optic network is capable of delivering voice and broadband service that meets the requisite performance requirements and sufficient capacity to meet customer demand at or above the prescribed levels during peak usage periods. *See id.*

<sup>28</sup> *Id.* at 6174 (¶ 312) (citing 47 CFR §§ 54.804(b)(2)(v), 54.804(b)(2)(vi)).



**D. TriCoLink Meets the Requirements Adopted by the South Carolina Public Service Commission To Be Designated as an Eligible Telecommunications Carrier.**

As certified by an officer of the Company,<sup>29</sup> TriCoLink will meet each of the requirements applicable to ETCs adopted by the Commission, as described in the following sections.

**1. Provision of Service.**

TriCoLink, throughout its proposed ETC Designation Area, will provide service to all customers making a reasonable request for service, and will provide service on a timely basis to requesting customers within its proposed ETC Designation Area where Applicant's network passes the potential customer's premises.<sup>30</sup>

**2. Ability to Remain Functional in Emergency Situations.**

TriCoLink commits that its fiber optic network will have the ability to remain functional in emergency situations, will have a reasonable amount of back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities, and will be capable of managing traffic spikes resulting from emergency situations.<sup>31</sup>

**3. Satisfaction of Applicable Consumer Protection and Service Quality Standards.**

Under the Commission's regulations, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.<sup>32</sup> TriCoLink commits to satisfying all such applicable Commission and federal requirements related to consumer protection and

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<sup>29</sup> See **Exhibit C**.

<sup>30</sup> S.C. Code R.103-690.C.(a)(1)(A)(1).

<sup>31</sup> *Id.*, R.103-690.C.(a)(2). See 47 CFR § 54.202(a)(2) (providing that a common carrier seeking an ETC designation by the FCC must "[d]emonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations").

<sup>32</sup> S.C. Code R.103-690.C.(a)(3). See 47 CFR § 54.202(a)(3).

service quality standards. In addition, with respect to Lifeline service, the Company commits to annually certifying compliance with consumer protection and service quality rules on an annual basis consistent with Section 54.422(b)(3) of the FCC's rules.<sup>33</sup>

#### **4. Local Usage Plan.**

Pursuant to Commission requirements, TriCoLink commits to offer a local usage plan that will be comparable to the plan offered by incumbent local exchange carrier(s) ("LEC") in its proposed ETC Designation Area, through the offering of various bundled calling plans and packages.<sup>34</sup>

#### **5. Equal Access to Long Distance Carriers.**

As certified by an officer of the Company,<sup>35</sup> TriCoLink acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the proposed ETC Designation Area.<sup>36</sup> In addition, pursuant to the Commission's rules,<sup>37</sup> the Company will file an annual certification acknowledging the fact that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within its proposed ETC Designation Area.

#### **6. Use of TriCoLink and Tri-County Electric Cooperative Facilities.**

As certified by an officer of the Company,<sup>38</sup> TriCoLink will use its own facilities, as well as those of its parent, Tri-County Electric Cooperative, Inc., to deploy and operate a state-of-the-

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<sup>33</sup> 47 CFR § 54.422(b)(3).

<sup>34</sup> See S.C. Code R.103-690.C.(a)(4).

<sup>35</sup> See **Exhibit C**.

<sup>36</sup> See S.C. Code R.103-690.C.(a)(5).

<sup>37</sup> *Id.*, R.103-690.1.B(b)(8).

<sup>38</sup> See **Exhibit C**.

art, low-latency, FTTH facilities-based network to provide high-speed broadband Internet access and interconnected VoIP services to customers, within its proposed ETC Designation Area, who lack access to such services.<sup>39</sup>

## 7. Advertising.

As certified by an officer of the Company,<sup>40</sup> TriCoLink will advertise the availability of, and charges for, its supported service offerings, including Lifeline service, using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements.<sup>41</sup>

TriCoLink will offer and advertise its broadband and interconnected VoIP services through a combination of media channels, such as newspaper, magazines, and other print advertisements, outdoor advertising, direct marketing, and/or the Internet. The Company also commits to advertise its Lifeline services throughout its proposed ETC Designation Area, and will also provide notices at local unemployment, social security, and welfare offices, in compliance with the Commission's rules.<sup>42</sup>

## V. DESIGNATION OF TRICOLINK AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER WILL SERVE THE PUBLIC INTEREST.

The grant of this Application, designating TriCoLink as an ETC, will clearly serve the public interest by enabling the Company to provide low-latency, gigabit-speed broadband, and interconnected VoIP-based voice services, to consumers in its proposed ETC Designation Area,

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<sup>39</sup> S.C. Code R.103-690.C.(a)(6). *See* 47 CFR § 54.201(d)(1).

<sup>40</sup> *See* **Exhibit C**.

<sup>41</sup> S.C. Code R.103-690.C.(a)(7). *See* 47 CFR § 54.201(d)(2).

<sup>42</sup> *Id.*, R.103-690.1.E.(a)(1), R.103-690.1.E.(b)(1).

as well as to provide subsidized voice and broadband services to those households that seek and qualify for federal Lifeline benefits.

Thus, grant of the Application will advance the Commission's objective "that consumers in all regions of South Carolina, including those in rural, insular and high-cost areas will have access to telecommunications services comparable to those in urban areas of the state."<sup>43</sup>

**A. Benefits of Increased Consumer Choice.**

A principal goal of the Telecommunications Act of 1996 is to "promote competition and reduce regulation in order to secure lower prices and high-quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies."<sup>44</sup> As a general matter, designation of competitive ETCs increases facilities and promotes development and deployment of advanced communications as carriers compete for consumers' business.

Designation of TriCoLink as an ETC in South Carolina will increase consumer choice<sup>45</sup> by promoting competition, and by facilitating the provision of high-quality communications services to those living and working within its proposed ETC Designation Area. Residents in many rural areas have long lagged behind those living in urban areas in receiving competitive local exchange service and advanced broadband services, and in some rural areas no meaningful choices for telephone and broadband services exist. The Company's deployment of low-latency, high-speed broadband service and high-quality VoIP phone services will also promote economic development in the rural areas it will serve.

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<sup>43</sup> *Id.*, R.103-690.A.2.

<sup>44</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) (preamble).

<sup>45</sup> See S.C. Code R.103-690.C.(b).

**B. Advantages of TriCoLink's Service Offerings.**

TriCoLink's service offerings will provide unique advantages to consumers in its proposed ETC Designation Area.<sup>46</sup> Most importantly, the Company's deployment of a new state-of-the-art, low-latency, FTTH network, providing high-speed broadband Internet access and interconnected VoIP services, will provide enormous benefits that previously have been beyond the reach of consumers and businesses in many of South Carolina's rural areas. The FTTH network will ensure reliable access to Gigabit tier broadband, thus enhancing educational programs, promoting business growth, generating jobs, and expanding cultural opportunities for South Carolinians.

**C. Designation of TriCoLink Will Not Result in "Cream-Skimming."**

As part of its public interest analysis, the Commission must determine whether TriCoLink's designation as an ETC would enable it to "cream-skim," that is, target low-cost portions of a rural incumbent LEC's service area in which uneconomically high levels of support are available.<sup>47</sup>

Grant of TriCoLink's application would not create any cream-skimming opportunities. The Company has no intention to target any particular service area based on the possibility of receiving uneconomic levels of support. In fact, the proposed ETC Designation Area is principally comprised of areas in which the Cooperative provides electric services to its members.

Moreover, the FCC, in its *RDOF Order*, concluded:

[F]or those entities that obtain ETC designations as a result of being selected as winning bidders for the Rural Digital Opportunity Fund, we forbear from applying section 214(e)(5) of the Act, insofar as this section requires that the service area of

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<sup>46</sup> See *id.*

<sup>47</sup> See *id.*



such an ETC conform to the service area of any rural telephone company serving an area eligible for Rural Digital Opportunity Fund support.<sup>48</sup>

The FCC noted that, “[a]ccordingly, Commission rules regarding the redefinition process are inapplicable to petitions that are subject to this order.”<sup>49</sup>

## **VI. REQUEST FOR WAIVER OF REQUIREMENT TO SUBMIT A TWO-YEAR UPGRADES OR IMPROVEMENTS PLAN.**

TriCoLink seeks a waiver of the Commission’s requirement to “submit a two-year plan that describes with specificity proposed improvements or upgrades to the applicant’s network ....”<sup>50</sup> Such a waiver is appropriate because deployment obligations and timetables imposed on RDOF Phase I support recipients by the FCC in the *RDOF Order* are sufficient to ensure timely deployment of voice and broadband services, consistent with the policies reflected in the Commission’s two-year plan requirement.

Specifically, the FCC requires RDOF Phase I support recipients to commercially offer voice and broadband service to “40% of [a calculated] number of locations in a state by the end of the third full calendar year following funding authorization, and 20% each calendar year thereafter.”<sup>51</sup> In addition, the FCC requires support recipients to file annual reports containing location and technology data, and to certify when they have met their service milestones.<sup>52</sup>

The FCC has previously decided that similar service milestones and reporting requirements applicable to Connect America Fund (“CAF”) Phase II support recipients warranted waiver by the

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<sup>48</sup> *RDOF Order*, 35 FCC Rcd at 728 (¶ 94).

<sup>49</sup> *Id.* at 728 (¶ 94 n.268).

<sup>50</sup> S.C. Code R.103-690.C.(a)(1)(B).

<sup>51</sup> *RDOF Order*, 35 FCC Rcd at 709 (¶ 45).

<sup>52</sup> *Id.* at 712 (¶ 56).

FCC of its requirement, in Sections 54.202(a)(1)(ii) and 54.202(a)(3) of its rules,<sup>53</sup> that support recipients must file five-year improvement plans, finding that its detailed buildout obligations for CAF Phase II support recipients provide a “more defined yardstick [than the five-year improvement plans] by which to measure [carriers’] progress towards the universal availability of voice and broadband service in their areas ....”<sup>54</sup>

For the same reasons, TriCoLink requests that the Commission waive the requirements of Reg. 103-690.C.(a)(1)(B) to submit a two-year plan describing the proposed improvements or upgrades. The Commission has previously granted such a waiver in response to a petition filed by a CAF Phase II auction winning bidder that was seeking an ETC designation.<sup>55</sup> If the waiver is granted, then, instead of filing the two-year plan, the Company will make available to the Commission and the Office of Regulatory Staff all reports it is required to file with the FCC in connection with the funding awarded in the RDOF Phase I auction.

## VII. CONCLUSION.

For all of the foregoing reasons, TriCoLink, Inc., respectfully requests that the Commission designate the Company as both a high-cost and low-income eligible telecommunications carrier, so that the Company will be eligible to receive the Rural Digital Opportunity Fund Phase I support it has been awarded in Auction 904, as well as federal Lifeline support throughout its proposed ETC Designation Area.

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<sup>53</sup> 47 CFR §§ 54.202(a)(1)(ii), 54.202(a)(3).

<sup>54</sup> *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket No. 09-197, *et al.*, Public Notice, 33 FCC Rcd 6696, 6700 & n.34 (quotation marks and citation omitted).

<sup>55</sup> *See Application of Horry Telephone Company for Designation as an ETC in Certain Census Blocks in Georgetown and Marion Counties for Purposes of Receiving Federal Connect America Fund (“CAF”) Phase II Support*, Docket 2018-346-C. The Commission granted Horry’s application, and specifically granted its request for waiver of the requirement to file a two-year plan.

Respectfully submitted,

s/John G. Felder, Sr.

John G. Felder, Sr.  
The Felder Firm, LLP  
P.O. Box 346  
St. Matthews, SC 29135  
Phone: (803) 874-1430  
Fax: (803) 655-7167  
E-mail: [johngfelder@sc.rr.com](mailto:johngfelder@sc.rr.com)  
S.C. Bar No. 1977

Todd B. Lantor  
LUKAS, LAFURIA, GUTIERREZ & SACHS, LLP  
8300 Greensboro Drive  
Suite 1200  
Tysons, Virginia 22102  
Phone: (703) 584-8671  
E-mail: [tlantor@fcclaw.com](mailto:tlantor@fcclaw.com)

*Counsel to TriCoLink, Inc.*

January 4, 2021

**VERIFICATION**

STATE OF SOUTH CAROLINA   )  
  )  
COUNTY OF CALHOUN         )

I, Chad T. Lowder, state that I am the Chief Executive Officer of TriCoLink, Inc.; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge, and belief; and that I am authorized to make this statement on behalf of TriCoLink, Inc.



Chad T. Lowder  
Chief Executive Officer  
TriCoLink, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing TriCoLink, Inc., Application for Designation as an Eligible Telecommunications Carrier was served by electronic mail or U.S. Mail, postage prepaid, this 4th day January, 2021, upon the following:

C. Lessie Hammonds, Esquire  
State of South Carolina  
Office of Regulatory Staff (ORS)  
1401 Main Street, Suite 900  
Columbia, SC 29201

Alexander W. Knowles, Esquire  
State of South Carolina  
Office of Regulatory Staff (ORS)  
1401 Main Street, Suite 900  
Columbia, SC 29201

s/ Bates N. Felder

Bates N. Felder



**EXHIBIT A1**

**LIST OF CENSUS BLOCKS IN WHICH  
APPLICANT SEEKS DESIGNATION  
AS A HIGH COST AND LOW-INCOME (LIFELINE)  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

450179502001002  
450179502001003  
450179502001006  
450179502001024  
450179502001035  
450630207052026  
450630207061003  
450630207061028  
450750109001001  
450750109001004  
450750109001013  
450790114071107  
450790114071109  
450799801001000  
450799801001102  
450799801001104

**EXHIBIT A2**

**LIST OF CENSUS BLOCKS IN WHICH  
APPLICANT SEEKS DESIGNATION  
SOLELY AS A LOW-INCOME (LIFELINE)  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

450179501001001	450179501001070	450179501002027	450179501003075
450179501001002	450179501001071	450179501002029	450179501003076
450179501001008	450179501001072	450179501002030	450179501003077
450179501001010	450179501001073	450179501002032	450179501003079
450179501001011	450179501001074	450179501002036	450179501003080
450179501001013	450179501001075	450179501002038	450179501003081
450179501001015	450179501001077	450179501002039	450179501003082
450179501001017	450179501001078	450179501002040	450179501003083
450179501001019	450179501001082	450179501002041	450179501003090
450179501001020	450179501001083	450179501002042	450179502001005
450179501001021	450179501001084	450179501002043	450179502001009
450179501001022	450179501001085	450179501002044	450179502001010
450179501001023	450179501001086	450179501002045	450179502001011
450179501001024	450179501001087	450179501002046	450179502001013
450179501001025	450179501001089	450179501002047	450179502001017
450179501001026	450179501001090	450179501002048	450179502001018
450179501001027	450179501001092	450179501002049	450179502001019
450179501001028	450179501001098	450179501002050	450179502001020
450179501001032	450179501001118	450179501002051	450179502001021
450179501001035	450179501001119	450179501002053	450179502001022
450179501001036	450179501002000	450179501002056	450179502001023
450179501001037	450179501002001	450179501003000	450179502001025
450179501001039	450179501002002	450179501003001	450179502001026
450179501001040	450179501002004	450179501003026	450179502001027
450179501001042	450179501002005	450179501003027	450179502001028
450179501001044	450179501002006	450179501003028	450179502001029
450179501001048	450179501002007	450179501003031	450179502001030
450179501001049	450179501002008	450179501003032	450179502001031
450179501001052	450179501002009	450179501003051	450179502001032
450179501001054	450179501002012	450179501003055	450179502001033
450179501001055	450179501002013	450179501003059	450179502001034
450179501001056	450179501002014	450179501003060	450179502001036
450179501001057	450179501002015	450179501003062	450179502001038
450179501001058	450179501002016	450179501003066	450179502002000
450179501001059	450179501002019	450179501003067	450179502002001
450179501001060	450179501002020	450179501003069	450179502002002
450179501001061	450179501002021	450179501003070	450179502002004
450179501001062	450179501002022	450179501003071	450179502002005
450179501001063	450179501002024	450179501003072	450179502002007
450179501001064	450179501002025	450179501003073	450179502002008
450179501001069	450179501002026	450179501003074	450179502002009

**Note:** To the extent that any census blocks where Applicant is seeking Lifeline-only ETC designation have been inadvertently excluded from Exhibit A2, Applicant requests Lifeline-only ETC designation throughout its parent electric cooperative's, Tri-County Electric Cooperative, Inc., entire electric service territory in South Carolina.

450179502002016	450179502005039	450179504001059	450179504001119
450179502002023	450179502005040	450179504001060	450179504001120
450179502002024	450179502005042	450179504001061	450179504001121
450179502002026	450179502005043	450179504001062	450179504001122
450179502002029	450179502005044	450179504001064	450179504001123
450179502002034	450179502005045	450179504001065	450179504001124
450179502002038	450179502005049	450179504001067	450179504001126
450179502002040	450179502005051	450179504001068	450179504001127
450179502003000	450179502005052	450179504001070	450179504001128
450179502003004	450179502005053	450179504001074	450179504001129
450179502003015	450179502005054	450179504001075	450179504001131
450179502003016	450179502005055	450179504001077	450179504001132
450179502003018	450179502005056	450179504001078	450179504001133
450179502003019	450179502005057	450179504001079	450179504001135
450179502003020	450179502005062	450179504001080	450179504001137
450179502003021	450179502005066	450179504001082	450179504001138
450179502003022	450179502005067	450179504001087	450179504001147
450179502003023	450179502005068	450179504001088	450179504001151
450179502003024	450179502005069	450179504001089	450179504002001
450179502003069	450179502005070	450179504001091	450179504002002
450179502003071	450179502005073	450179504001094	450179504002004
450179502003072	450179504001003	450179504001096	450179504002005
450179502003073	450179504001005	450179504001097	450179504002006
450179502003074	450179504001010	450179504001098	450179504002007
450179502003075	450179504001012	450179504001099	450179504002008
450179502003080	450179504001029	450179504001100	450179504002010
450179502003081	450179504001030	450179504001101	450179504002011
450179502003082	450179504001032	450179504001102	450179504002012
450179502003084	450179504001033	450179504001103	450179504002013
450179502003087	450179504001034	450179504001105	450179504002014
450179502003088	450179504001035	450179504001106	450179504002016
450179502003089	450179504001036	450179504001107	450179504002017
450179502003090	450179504001041	450179504001108	450179504002018
450179502003091	450179504001045	450179504001109	450179504002019
450179502003093	450179504001047	450179504001110	450179504002020
450179502004000	450179504001050	450179504001111	450179504002021
450179502004009	450179504001051	450179504001112	450179504002022
450179502004011	450179504001052	450179504001113	450179504002023
450179502005026	450179504001053	450179504001114	450179504002034
450179502005033	450179504001056	450179504001115	450179504002035
450179502005037	450179504001058	450179504001116	450179504002038

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450179504002040	450179504003049	450630207051014	450630207061057
450179504002041	450179504003050	450630207051049	450630207061058
450179504002042	450179504003051	450630207051050	450630207061060
450179504002043	450179504003052	450630207051058	450630207061063
450179504002044	450179504003053	450630207052002	450630207061065
450179504002046	450179504003054	450630207052003	450630207061066
450179504002048	450179504003055	450630207052005	450630207061067
450179504002050	450179504003056	450630207052006	450630207061068
450179504002061	450179504003057	450630207052007	450630207061069
450179504002062	450179504003067	450630207052009	450630207061070
450179504002063	450179504003068	450630207052010	450630207062010
450179504002064	450179504003069	450630207052011	450630208011000
450179504002067	450179504003070	450630207052012	450630208011003
450179504002074	450179504003071	450630207052013	450630208011005
450179504002076	450179504003072	450630207052019	450630208011006
450179504002082	450179504003077	450630207052020	450630208011008
450179504003003	450179504003078	450630207052022	450630208011010
450179504003006	450179504003079	450630207052024	450630208011011
450179504003013	450179504003080	450630207052027	450630208011013
450179504003014	450179504004002	450630207052028	450630208011014
450179504003015	450179504004006	450630207052030	450630208011018
450179504003018	450179504004007	450630207052031	450630208011019
450179504003019	450179504004009	450630207052032	450630208011021
450179504003020	450179504004010	450630207052033	450630208011022
450179504003021	450179504004012	450630207052034	450630208011023
450179504003025	450179504004030	450630207052035	450630208011024
450179504003027	450559709021088	450630207052046	450630208011025
450179504003032	450559709021109	450630207052047	450630208011026
450179504003033	450559709021111	450630207052048	450630208011027
450179504003035	450559709021112	450630207052049	450630208011029
450179504003036	450559709021114	450630207052051	450630208011030
450179504003037	450559709021116	450630207052052	450630208011032
450179504003038	450559709021123	450630207052054	450630208011033
450179504003039	450630207051002	450630207052055	450630208011034
450179504003040	450630207051003	450630207061008	450630208011036
450179504003041	450630207051007	450630207061023	450630208011037
450179504003042	450630207051008	450630207061026	450630208011038
450179504003045	450630207051009	450630207061034	450630208011039
450179504003046	450630207051010	450630207061039	450630208011040
450179504003047	450630207051012	450630207061051	450630208011043
450179504003048	450630207051013	450630207061052	450630208011052

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450630208011076	450750102002011	450750103002000	450750103003005
450630208051020	450750102002015	450750103002001	450750103003006
450630208051022	450750102002021	450750103002002	450750103003007
450630208051023	450750103001000	450750103002005	450750103003009
450630208051032	450750103001002	450750103002006	450750103003010
450630208051033	450750103001003	450750103002007	450750103003011
450630208051037	450750103001004	450750103002012	450750103003012
450750101001000	450750103001005	450750103002013	450750103003013
450750101001004	450750103001006	450750103002014	450750103003015
450750101001007	450750103001008	450750103002015	450750103003016
450750101001010	450750103001010	450750103002016	450750103003017
450750101001012	450750103001011	450750103002022	450750103003020
450750101001013	450750103001013	450750103002023	450750103003026
450750101001014	450750103001015	450750103002027	450750103003027
450750101001015	450750103001016	450750103002029	450750103003028
450750101001016	450750103001017	450750103002030	450750103003029
450750101001017	450750103001018	450750103002032	450750103003031
450750101001018	450750103001019	450750103002033	450750103003032
450750101001019	450750103001020	450750103002038	450750103003033
450750101001020	450750103001021	450750103002041	450750103003034
450750101001021	450750103001024	450750103002042	450750103003035
450750101001022	450750103001027	450750103002044	450750103003038
450750101001023	450750103001032	450750103002046	450750103003040
450750101001024	450750103001034	450750103002047	450750103003041
450750101001029	450750103001035	450750103002055	450750103003045
450750101001030	450750103001036	450750103002056	450750103003046
450750101001031	450750103001037	450750103002059	450750103003047
450750101003004	450750103001042	450750103002062	450750103003048
450750101003005	450750103001043	450750103002064	450750103003052
450750101003006	450750103001045	450750103002065	450750103003054
450750101003007	450750103001046	450750103002066	450750103003056
450750101003008	450750103001047	450750103002067	450750103003060
450750101003009	450750103001048	450750103002069	450750103003061
450750101003010	450750103001049	450750103002070	450750103003063
450750101003073	450750103001050	450750103002071	450750103003064
450750102002001	450750103001052	450750103002072	450750103003065
450750102002003	450750103001054	450750103002073	450750103003066
450750102002005	450750103001055	450750103003001	450750103003068
450750102002007	450750103001056	450750103003002	450750103003070
450750102002008	450750103001057	450750103003003	450750103003071
450750102002009	450750103001070	450750103003004	450750103003072

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450750103003075	450750103004075	450750104001000	450750104002024
450750103003076	450750103004076	450750104001001	450750104002025
450750103003077	450750103004078	450750104001003	450750104002026
450750103003078	450750103005002	450750104001006	450750104002027
450750103003081	450750103005003	450750104001007	450750104002028
450750103004000	450750103005007	450750104001009	450750104002029
450750103004001	450750103005008	450750104001013	450750104002031
450750103004002	450750103005010	450750104001014	450750104002032
450750103004005	450750103005011	450750104001015	450750104002033
450750103004007	450750103005012	450750104001017	450750104002035
450750103004008	450750103005016	450750104001018	450750104002040
450750103004011	450750103005017	450750104001019	450750104002042
450750103004012	450750103005019	450750104001025	450750104002043
450750103004013	450750103005020	450750104001026	450750104002046
450750103004014	450750103005021	450750104001027	450750104002051
450750103004020	450750103005022	450750104001028	450750104002052
450750103004021	450750103005023	450750104001029	450750104002053
450750103004022	450750103005024	450750104001030	450750104002054
450750103004023	450750103005027	450750104001031	450750104002055
450750103004024	450750103005028	450750104001032	450750104002056
450750103004025	450750103005049	450750104001035	450750104002057
450750103004026	450750103005053	450750104001044	450750104002058
450750103004027	450750103005054	450750104001046	450750104002060
450750103004028	450750103005055	450750104001047	450750104002061
450750103004029	450750103005056	450750104001048	450750104002062
450750103004032	450750103005057	450750104001050	450750104002063
450750103004036	450750103005058	450750104001056	450750104002064
450750103004039	450750103005059	450750104001059	450750104002065
450750103004040	450750103005060	450750104001060	450750104002066
450750103004047	450750103005061	450750104001103	450750104002067
450750103004050	450750103005062	450750104001104	450750104002068
450750103004052	450750103005063	450750104001108	450750104002069
450750103004055	450750103005064	450750104001110	450750104002070
450750103004056	450750103005068	450750104001111	450750104002072
450750103004057	450750103005069	450750104001112	450750104002073
450750103004059	450750103005072	450750104001114	450750104002081
450750103004061	450750103005075	450750104002003	450750104002083
450750103004062	450750103005077	450750104002007	450750104002084
450750103004063	450750103005078	450750104002017	450750104002087
450750103004066	450750103005083	450750104002022	450750104002088
450750103004074	450750103005084	450750104002023	450750104002089

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450750104002091	450750104003045	450750108001064	450750109001009
450750104002094	450750104003046	450750108001065	450750109001010
450750104002095	450750104003047	450750108001066	450750109001011
450750104002098	450750104003048	450750108001068	450750109001012
450750104002099	450750104003050	450750108001069	450750109001015
450750104002100	450750104003051	450750108001072	450750109001016
450750104002101	450750104003052	450750108001073	450750109001017
450750104002102	450750104003053	450750108001074	450750109001018
450750104002106	450750104003056	450750108001075	450750109001019
450750104002108	450750104003061	450750108001082	450750109001024
450750104002109	450750104003082	450750108001087	450750109001026
450750104002110	450750104003093	450750108001088	450750109001031
450750104002111	450750104003094	450750108001091	450750109001037
450750104002112	450750104003097	450750108001092	450750109001040
450750104003001	450750108001001	450750108001095	450750109001041
450750104003002	450750108001002	450750108001096	450750109001051
450750104003003	450750108001003	450750108001097	450750111002003
450750104003004	450750108001004	450750108001098	450750111002004
450750104003008	450750108001006	450750108001100	450750111002005
450750104003010	450750108001007	450750108001101	450750111002014
450750104003011	450750108001012	450750108001102	450750111002015
450750104003012	450750108001014	450750108001103	450750111002019
450750104003013	450750108001016	450750108001104	450750111002020
450750104003014	450750108001018	450750108001105	450750111002021
450750104003015	450750108001019	450750108001106	450750111002024
450750104003018	450750108001021	450750108001112	450750111002027
450750104003019	450750108001022	450750108001113	450790114071104
450750104003020	450750108001023	450750108001114	450790114071105
450750104003022	450750108001024	450750108001115	450790114071106
450750104003023	450750108001025	450750108001116	450790114071110
450750104003024	450750108001026	450750108001117	450790118001001
450750104003025	450750108001030	450750108001118	450790118001003
450750104003026	450750108001034	450750108001119	450790118001006
450750104003031	450750108001035	450750108001120	450790118001007
450750104003033	450750108001045	450750108001122	450790118001008
450750104003035	450750108001047	450750108001123	450790118001009
450750104003036	450750108001048	450750108001132	450790118001011
450750104003037	450750108001053	450750108001145	450790118001012
450750104003038	450750108001056	450750109001006	450790118001019
450750104003040	450750108001059	450750109001007	450790118001027
450750104003041	450750108001062	450750109001008	450790118001028

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450790118001029	450790118002043	450790118003032	450790118003135
450790118001030	450790118002044	450790118003034	450790118004000
450790118001031	450790118002045	450790118003035	450790118004002
450790118001032	450790118002046	450790118003036	450790118004007
450790118001033	450790118002047	450790118003037	450790118004008
450790118001034	450790118002048	450790118003038	450790118004009
450790118001035	450790118002050	450790118003039	450790118004010
450790118001036	450790118002051	450790118003040	450790118004012
450790118001037	450790118002052	450790118003041	450790118004014
450790118001038	450790118002053	450790118003042	450790118004019
450790118001039	450790118002054	450790118003043	450790118004021
450790118002003	450790118002056	450790118003044	450790118004022
450790118002006	450790118002061	450790118003045	450790118004033
450790118002007	450790118002062	450790118003046	450790118004064
450790118002008	450790118002063	450790118003047	450790118004065
450790118002010	450790118002064	450790118003048	450790118004068
450790118002011	450790118002067	450790118003049	450790118004071
450790118002012	450790118003002	450790118003050	450790118004074
450790118002013	450790118003004	450790118003052	450790118004075
450790118002014	450790118003005	450790118003053	450790118004076
450790118002015	450790118003007	450790118003055	450790118004078
450790118002017	450790118003008	450790118003059	450790118004079
450790118002019	450790118003009	450790118003061	450790118004081
450790118002020	450790118003010	450790118003065	450790118004082
450790118002021	450790118003011	450790118003067	450790118004083
450790118002022	450790118003012	450790118003082	450790118004084
450790118002023	450790118003013	450790118003083	450790118004085
450790118002024	450790118003014	450790118003084	450790118004086
450790118002025	450790118003015	450790118003085	450790118004087
450790118002026	450790118003018	450790118003086	450790118004088
450790118002027	450790118003019	450790118003087	450790118004089
450790118002028	450790118003020	450790118003088	450790118004090
450790118002029	450790118003021	450790118003092	450790118004092
450790118002031	450790118003022	450790118003099	450790118004096
450790118002032	450790118003024	450790118003100	450790118004097
450790118002034	450790118003025	450790118003101	450790118004099
450790118002036	450790118003026	450790118003102	450790118004100
450790118002038	450790118003027	450790118003106	450790118004101
450790118002039	450790118003029	450790118003112	450790118004102
450790118002040	450790118003030	450790118003122	450790118004103
450790118002041	450790118003031	450790118003134	450790118004104

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450790118004105	450790119021021	450790119023024	450790120001053
450790118004106	450790119021022	450790119023025	450790120001054
450790118004107	450790119021023	450790119023032	450790120001055
450790118004108	450790119021028	450790119023034	450790120001060
450790118004109	450790119021030	450790119023067	450790120001061
450790118004110	450790119021033	450790119023069	450790120001062
450790118004112	450790119021037	450790119023070	450790120001067
450790118004113	450790119021039	450790119023072	450790120001070
450790118004114	450790119021040	450790119023073	450790120001071
450790118004115	450790119021041	450790119023074	450790120001072
450790118004117	450790119021042	450790119023075	450790120001073
450790118004118	450790119021043	450790119023076	450790120001075
450790118004119	450790119022000	450790119023077	450790120001076
450790118004120	450790119022001	450790119023078	450790120001078
450790118004121	450790119022002	450790119023079	450790120001079
450790118004127	450790119022005	450790120001013	450790120001082
450790118004128	450790119022006	450790120001019	450790120001083
450790118004129	450790119022012	450790120001020	450790120001084
450790118004130	450790119022017	450790120001023	450790120001085
450790118004131	450790119022019	450790120001025	450790120001087
450790118004132	450790119022024	450790120001026	450790120001088
450790118004133	450790119022026	450790120001027	450790120001090
450790118004134	450790119022027	450790120001028	450790120001091
450790118004138	450790119022029	450790120001030	450790120001093
450790118004151	450790119022032	450790120001032	450790120001094
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450790118004153	450790119022035	450790120001036	450790120001107
450790119013025	450790119022036	450790120001037	450790120001111
450790119013026	450790119022039	450790120001038	450790120001112
450790119013028	450790119022046	450790120001039	450790120001115
450790119021000	450790119022055	450790120001040	450790120001120
450790119021003	450790119022068	450790120001041	450790120001122
450790119021005	450790119023005	450790120001042	450790120001123
450790119021006	450790119023006	450790120001043	450790120001126
450790119021008	450790119023011	450790120001044	450790120001129
450790119021010	450790119023015	450790120001046	450790120001130
450790119021014	450790119023018	450790120001048	450790120001131
450790119021016	450790119023019	450790120001049	450790120001132
450790119021017	450790119023021	450790120001050	450790120001135
450790119021019	450790119023022	450790120001051	450790120001137
450790119021020	450790119023023	450790120001052	450790120001146

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450790120001150	450790120002047	450790120003055	450790120003175
450790120001156	450790120002057	450790120003056	450790120003176
450790120001168	450790120002058	450790120003058	450790120004000
450790120001169	450790120002061	450790120003062	450790120004001
450790120001174	450790120002062	450790120003064	450790120004003
450790120001183	450790120002063	450790120003066	450790120004006
450790120001184	450790120003001	450790120003069	450790120004007
450790120001188	450790120003002	450790120003072	450790120004010
450790120002000	450790120003003	450790120003073	450790120004012
450790120002001	450790120003004	450790120003099	450790120004014
450790120002004	450790120003005	450790120003121	450790120004015
450790120002005	450790120003007	450790120003122	450790120004016
450790120002006	450790120003010	450790120003124	450790120004018
450790120002008	450790120003012	450790120003125	450790120004019
450790120002009	450790120003013	450790120003126	450790120004021
450790120002013	450790120003014	450790120003127	450790120004023
450790120002014	450790120003015	450790120003128	450790120004024
450790120002016	450790120003016	450790120003129	450790120004026
450790120002017	450790120003017	450790120003130	450790120004027
450790120002018	450790120003018	450790120003131	450790120004028
450790120002019	450790120003019	450790120003132	450790120004029
450790120002020	450790120003021	450790120003133	450790120004032
450790120002021	450790120003022	450790120003134	450790120004033
450790120002022	450790120003023	450790120003139	450790120004034
450790120002023	450790120003024	450790120003140	450790120004035
450790120002024	450790120003025	450790120003141	450790120004036
450790120002025	450790120003026	450790120003144	450790120004037
450790120002026	450790120003029	450790120003148	450790120004038
450790120002027	450790120003030	450790120003154	450790120004039
450790120002028	450790120003031	450790120003157	450790120004040
450790120002029	450790120003032	450790120003158	450790120004041
450790120002031	450790120003033	450790120003159	450790120004042
450790120002032	450790120003036	450790120003160	450790120004043
450790120002033	450790120003038	450790120003161	450790120004044
450790120002034	450790120003039	450790120003162	450790120004045
450790120002035	450790120003041	450790120003163	450790120004046
450790120002036	450790120003042	450790120003164	450790120004047
450790120002040	450790120003044	450790120003165	450790120004048
450790120002042	450790120003045	450790120003171	450790120004049
450790120002043	450790120003046	450790120003172	450790120004052
450790120002044	450790120003048	450790120003174	450790120004053

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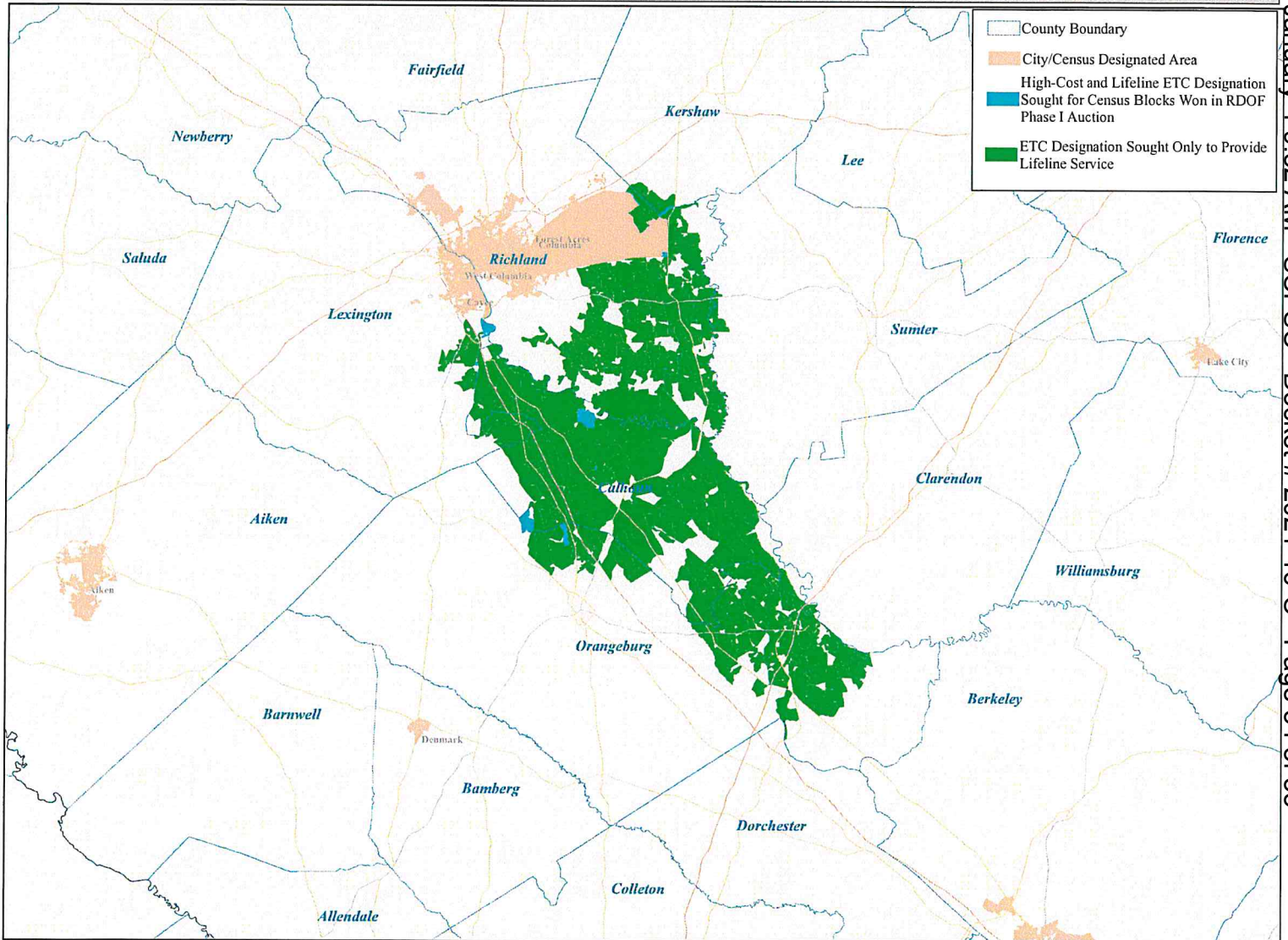
450790120004054	450790120004075	450790120004103	450850002011110
450790120004055	450790120004076	450799801001026	450850018021049
450790120004056	450790120004081	450799801001027	450850018021067
450790120004059	450790120004082	450799801001029	450850018021070
450790120004061	450790120004089	450799801001030	450850018021071
450790120004062	450790120004090	450799801001076	
450790120004064	450790120004091	450799801001080	
450790120004069	450790120004097	450799801001081	

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**EXHIBIT B**

**MAP OF AREA IN WHICH  
APPLICANT SEEKS DESIGNATION  
AS A HIGH COST AND/OR LIFELINE-ONLY  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

TriCoLink, Inc. – Proposed ETC Designation Area in South Carolina



**EXHIBIT C****AFFIDAVIT OF CHAD T. LOWDER**

Chad T. Lowder, after being duly sworn, states the following:

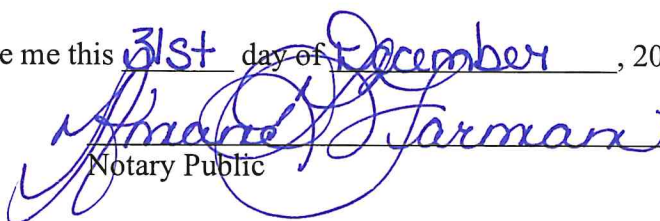
1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.
2. I am the Chief Executive Officer of TriCoLink, Inc. ("Applicant"). I have read the Application to which this Affidavit is attached. I have knowledge of the facts stated in the Application and those facts are true to the best of my knowledge and my belief.
3. Applicant certifies that it is a common carrier under §§ 214(e)(1)-(2) of the Communications Act of 1934 ("Act").
4. Applicant commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier ("ETC") in its proposed ETC Designation Area.
5. Applicant certifies that it will meet all of the FCC's requirements for designation as an ETC under § 214(e)(1) of the Act, and all of the Commission's requirements for designation as an ETC.
6. Applicant is eligible to be designated as an ETC within the meaning of Section 214(e) of the Act and is eligible to receive federal universal service support pursuant to Section 254(e) of the Act.
7. Applicant will use the federal high-cost support funds that it receives only to provide, deploy, upgrade and/or maintain facilities and services for which the support is intended.



Chad T. Lowder  
Chief Executive Officer  
TriCoLink, Inc.

STATE OF SOUTH CAROLINA    )  
  )  
COUNTY OF CALHOUN         )       ss

Subscribed and sworn to before me this 31st day of December, 2020.

  
Notary Public